

REMARKS/ARGUMENTS

Prior to the entry of this Amendment, claims 1, 3-16, 18-27, and 29-52 were pending in this application. Claims 1, 3, 16, 18, 27, 29, 31 and 32 have been amended, claims 15, 26, and 37 have been canceled and no claims have been added herein. Therefore, claims 1, 3-14, 16, 18-25, 27, 29-36, and 38-52 are now pending in this application. Applicants request reconsideration of this application for at least the reasons presented below.

35 U.S.C. § 102 Rejection, Patel

The Office Action has rejected claims 1, 3-16, 18-27 and 29-52 under 35 U.S.C. § 102(e) as being anticipated by U. S. Patent No. 6,438,690 B1 to Patel et al. (hereinafter "Patel"). The Applicant respectfully submits the following arguments pointing out significant differences between claims 1-52 submitted by the Applicant and Patel.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." MPEP 2131 citing *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Applicants respectfully argue that Patel fails to disclose each and every claimed element. For example, Patel fails to disclose, either expressly or inherently, retrieving a workflow from a set of workflows, wherein the workflow corresponds to a certificate related action and a set of characteristics for a user, wherein the set of workflows includes a plurality of workflows for responding to the certificate related action, or wherein each workflow in the set of workflows corresponds to a different set of characteristics for a user. Furthermore, Patel fails to disclose, expressly or inherently, retrieving such a workflow by an Identity System that maintains an identity profile for the user or the set of characteristics for the user being from the identity profile.

Patel relates to "a secure end-to-end communication system using [Public Key Infrastructure (PKI)] for conducting electronic commerce." (Col. 3, lines 34-35) Under Patel, "the system includes web based [Registration Authorities (RAs)] and end users coupled to a vault controller." (Col. 3, lines 35-37) "The controller includes a registration application which includes an enrollment component which provides web pages and functions that implement a vault based process of applying and receiving a digital certificate by an end user." (Col. 3, lines 37-41) Patel discloses a method in which "a user submits an enrollment form to the vault controller requesting a certificate." (Col. 3, lines 51-53) The form is validated in the registration application by the enrollment component which in turn submits the approved form to the master registration component for creation of an application for a certificate for the end user. (Col. 3, lines 54-59) "The RA reviews each registration request. As part of the review, the RA may need to perform additional verification of the applicant's request **as determined by an organization's policy.**" (Col. 5, lines 5-8) That is, the registration authority may perform different verification procedures depending upon the requirements of the organization for which the certificate is being issued, i.e., "the customer." In other words, if an end user wants a certificate for company X, a policy is selected and applied based on the requirements of company X, not based on the user or the user's type.

Furthermore, Patel does not disclose retrieving by an Identity System a workflow for responding to said request from a set of workflows wherein said workflow for responding to said request corresponds to said certificate related action and a set of characteristics for said user from an identity profile maintained by the Identity System and including a user type. Assuming for the sake of argument that either the vault controller or the registration authority of Patel can be considered to be an Identity System, Patel does not disclose either of these systems maintaining an identity profile for the users requesting certificates. Further, Patel does not disclose selecting a workflow based on a user type from such an identity profile.

Claim 1, upon which claims 2-15 depend, claim 16, upon which claims 17-26 depend, and claim 27, upon which claims 28-37 depend, each recite in part "retrieving by the

Identity System a workflow for responding to said request from a set of workflows, wherein said set of workflows includes a plurality of workflows for responding to said certificate related action and wherein each workflow in said plurality of workflows corresponds to a different set of characteristics for a user and wherein said workflow for responding to said request corresponds to said certificate related action and a set of characteristics for said user from an identity profile maintained by the Identity System and including a user type." Patel does not disclose retrieving a workflow for responding to a request from a set of workflows, wherein the workflow corresponds to a set of characteristics for the user including a user type. Rather, under Patel, the registration authority may perform different verification procedures depending only upon the requirements of the organization for which the certificate is being issued, not a set of characteristics for the user or the type of user. Furthermore, Patel does not disclose an Identity System that maintains an identity profile for the user and retrieves a workflow for responding to the request based on a user type or any other information from such an identity profile. For at least these reasons, claims 1, 3-14, 16, 18-25, 27, and 29-36 are distinguishable from Patel and should be allowed.

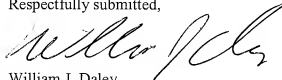
Claim 38, upon which claims 39-42 depend, claim 43, upon which claims 44-47 depend, and claim 48, upon which claims 49-52 depend, each recite in part "receiving a request for a certificate related action for a user; and retrieving a workflow for responding to said request from a set of workflows, wherein said workflow corresponds to said certificate related action and a set of characteristics for said user, wherein said set of workflows includes a plurality of workflows for responding to said certificate related action, and wherein each workflow in said plurality of workflows corresponds to a different set of characteristics for a user." Patel does not disclose retrieving a workflow for responding to a request wherein the workflow corresponds to a set of characteristics for the user and each workflow corresponds to a different set of characteristics for the user. Rather, under Patel, the registration authority may perform different verification procedures depending only upon the requirements of the organization for which the certificate is being issued, not a set of characteristics for the user. For at least these reasons, claims 38-52 are distinguishable from Patel and should be allowed.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'William J. Daley', written in a cursive style.

William J. Daley
Reg. No. 52,471

TOWNSEND and TOWNSEND and CREW LLP
Two Embarcadero Center, Eighth Floor
San Francisco, California 94111-3834
Tel: 303-571-4000 (Denver office)
Fax: 303-571-4321 (Denver office)

WJD:sbm

60856530 v1